

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

PROMEDEV, LLC dba RELIEF FACTOR,

Plaintiff,

v.

AGE RELIEF, LLC; and MICHAEL JOSEPH
REDMOND,

Defendants.

CASE NO. 2:22-cv-01824-RSM

**SECOND STIPULATION AND ORDER
TO EXTEND TIME TO RESPOND TO
COMPLAINT**

**NOTE ON MOTION CALENDAR:
Monday, February 13, 2023**

Plaintiff Promedev, LLC dba Relief Factor ("Plaintiff") and defendants Age Relief, LLC and Michael Joseph Redmond ("Defendants") (collectively, the "Parties"), by and through their respective counsel, hereby stipulate and agree as follows:

WHEREAS, Plaintiff filed its Complaint on December 28, 2022;

WHEREAS, on January 18, 2023, the Court granted the Parties' Stipulation and Order to Extend Time to Respond to Plaintiff's Complaint [Dkt. # 9];

WHEREAS, Defendants' response to Plaintiff's complaint is due on February 17, 2023;

WHEREAS, the Parties have been working cooperatively regarding the early stages of the litigation, continue to be engaged in substantial discussions of the matters at issue in this dispute, and have commenced meaningful settlement discussions and exchanges;

WHEREAS, to facilitate the Parties' ongoing settlement discussions, the Parties agree to extend the deadline by which Defendants may respond to the Complaint to March 3, 2023;

1 WHEREFORE, IT IS HEREBY STIPULATED AND AGREED TO BY THE PARTIES,
2 that Defendants may have until March 3, 2023 to file and serve a response to the Complaint.

3 RESPECTFULLY SUBMITTED on this 13th day of February, 2023.

4 **GOLDFARB & HUCK ROTH RIOJAS, PLLC**

5 /s/Kit W. Roth

6 Kit W. Roth, WSBA No. 33059

7 /s/R. Omar Riojas

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11 Attorneys for Defendants

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18 Attorneys for Plaintiff

ORDER

Pursuant to the above stipulation, **IT IS SO ORDERED.**

DATED this 13th day of February, 2023.



RICARDO S. MARTINEZ
UNITED STATES DISTRICT JUDGE

Presented by:

/s/Kit W. Roth

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Attorney for Defendants

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SECOND STIPULATED MOTION TO EXTEND
DEADLINE TO RESPOND TO COMPLAINT - 4
CASE NO. 2:22-cv-01824-RSM

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically with the Clerk of the Court using the CM/ECF system on February 13, 2023 and was served via the Court's CM/ECF system on all counsel of record.

/s/ Kit W. Roth
Kit W. Roth, WSBA No. 33059